

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1		10/30/18	Toni Martinez	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
2		10/30/18	Jean Nechvatal	Maya Bordeaux; Grant Whitmore; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
3		10/30/18	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
4		10/30/18	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
5		10/30/18	Marisa Kollias	Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
6		10/30/18	Mindy Lees*	Marisa Kollias; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
7		10/30/18	Mindy Lees*	Marisa Kollias; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
8	NYDN00002178	10/30/18	Marisa Kollias	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Ann Barnes; Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
9		10/30/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
10	NYDN00002156	10/30/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
11		10/30/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
12	NYDN00002145	10/30/18	Marisa Kollias	Mindy Lees*	Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes; Toni Martinez; Grant Whitmore		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
13	NYDN00002344	10/30/18	Toni Martinez	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
14		10/30/18	Marisa Kollias	Mindy Lees*; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
15	NYDN00002192	10/30/18	Toni Martinez	Marisa Kollias	Mindy Lees*; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes; Grant Whitmore		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
16		10/31/18	Mindy Lees*	Toni Martinez			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
17		10/31/18	Mindy Lees*	Toni Martinez			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
18		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
19		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
20		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
21		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
22		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
23		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
24		10/31/18	Mindy Lees*	Justin Dearborn; Julie Xanders*; Terry Jimenez; Timothy Knight; Marisa Kollias			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
25		10/31/18	Mindy Lees*	Justin Dearborn; Julie Xanders*; Terry Jimenez; Timothy Knight; Marisa Kollias			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
26		10/31/18	Terry Jimenez	Mindy Lees*	Justin Dearborn; Julie Xanders*; Timothy Knight; Marisa Kollias		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
27		10/31/18	Mindy Lees*	Matthew Leish; Marci Sweren*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
28		10/31/18	Justin Dearborn	Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
29		10/31/18	Julie Xanders*	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
30		10/31/18	Timothy Knight	Justin Dearborn; Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
31		10/31/18	Mindy Lees*	Matthew Leish; Marci Sweren*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
32		10/31/18	Timothy Knight	Justin Dearborn; Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
33		11/1/18	Marisa Kollias	Timothy Knight; Justin Dearborn; Mindy Lees*	Julie Xanders*; Terry Jimenez		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
34		11/1/18	Marci Sweren*	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
35		11/1/18	Mindy Lees*	Ginger Otis; Robert York; Grant Whitmore	Toni Martinez; Maya Bordeaux		Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
36		11/1/18	Mindy Lees*	Ginger Otis; Robert York; Grant Whitmore	Toni Martinez; Maya Bordeaux		Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
37		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
38		11/1/18	Grant Whitmore	Mindy Lees*	Ginger Otis; Robert York; Toni Martinez; Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
39		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
40		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
41		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
42		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
43		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
44		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
45		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
46		11/1/18	Mindy Lees*	Maya Bordeaux			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
47		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
48		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
49		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
50		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
51		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
52		11/1/18	Matthew Leish	Mindy Lees*	Marci Sweren*		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
53		11/1/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
54		11/1/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
55		11/3/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
56		11/3/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
57	NYDN00002129	11/3/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
58		11/3/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
59	NYDN00002283	11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen; Robert Zisel		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
60		11/5/18	Toni Martinez	Jean Nechvatal; Mindy Lees*; Maya Bordeaux			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
61		11/5/18	Maya Bordeaux	Toni Martinez; Jean Nechvatal; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
62		11/5/18	Mindy Lees*	Robert Zisel; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
63		11/5/18	Robert Zisel	Mindy Lees*; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
64		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
65		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
66		11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
67		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
68		11/5/18	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
69		11/5/18	Jean Nechvatal	Maya Bordeaux			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
70		11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
71		11/5/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
72		11/5/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
73		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
74		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
75		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
76		11/5/18	Mindy Lees*	Maya Bordeaux	Toni Martinez		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
77		11/5/18	Mindy Lees*	Maya Bordeaux	Toni Martinez		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
78		11/5/18	Maya Bordeaux	Mindy Lees*	Toni Martinez		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
79		11/5/18	Maya Bordeaux	Mindy Lees*	Toni Martinez		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
80		11/5/18	Maya Bordeaux	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
81		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
82		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
83		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
84		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
85		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
86		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
87		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
88		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
89		11/6/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
90		11/6/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
91		11/6/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
92		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
93		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
94		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
95		11/6/18	Mindy Lees*	Toni Martinez; Maya Bordeaux			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
96		11/6/18	Toni Martinez	Mindy Lees*	Maya Bordeaux		Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
97		11/6/18	Mindy Lees*	Toni Martinez	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
98		11/6/18	Mindy Lees*	Toni Martinez	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
99		11/6/18	Robert Zisel	Mindy Lees*; Kevin Golen			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
100		11/6/18	Mindy Lees*	Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
101		11/6/18	Mindy Lees*	Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
102		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
103		11/6/18	Toni Martinez	Mindy Lees*	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
104		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
105		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
106		11/6/18	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
107		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
108		11/6/18	Toni Martinez	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
109		11/6/18	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
110		11/6/18	Julie Xanders*	Maya Bordeaux			Email providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
111		11/6/18	Mindy Lees*	Robert Zisel; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
112		11/6/18	Maya Bordeaux	Julie Xanders*			Email chain providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
113		11/6/18	Maya Bordeaux	Julie Xanders*			Email chain providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
114		11/6/18	Kevin Golen	Mindy Lees*; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
115		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
116		11/7/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
117		11/7/18	Matthew Leish	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
118	NYDN00002148	11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
119		11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler	Maya Bordeaux	Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
120	NYDN00002325	11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler	Maya Bordeaux	Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
121		11/7/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
122		11/7/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
123		11/7/18	Matthew Leish	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
124		11/8/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
125		11/8/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
126		11/8/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
127		11/8/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
128		11/13/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
129		11/13/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
130		11/14/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
131		11/14/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
132		11/14/18	Mindy Lees*	Maya Bordeaux; Toni Martinez			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
133		11/14/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
134		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
135		11/14/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
136		11/14/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
137		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
138		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
139	NYDN00002304	11/15/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
140		11/15/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
141		11/15/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
142		11/15/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
143		11/26/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
144		11/27/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
145		11/27/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
146		11/28/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
147		11/28/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
148		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
149		12/4/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
150		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
151		12/4/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
152		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
153		12/4/18	Maya Bordeaux	Justin Dearborn			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
154		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
155		12/4/18	Justin Dearborn	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
156		12/5/18	Robert Zisel	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
157		12/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
158		12/5/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
159		12/5/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
160		12/6/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
161		12/6/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
162		12/6/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
163		12/6/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
164		12/6/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
165		12/6/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
166		12/7/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
167		12/8/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
168		12/8/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
169		12/8/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
170	NYDN00002275	12/14/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
171	NYDN00002180	12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
172	NYDN00002182	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
173		12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
174	NYDN00002286	12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
175	NYDN00002288	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
176		12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
177		12/14/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
178		12/14/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
179		12/14/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
180	NYDN00002133	12/14/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
181	NYDN00002135	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
182	NYDN00002163	12/14/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
183	NYDN00002165	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
184		12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
185		12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
186		12/15/18	Justin Dearborn	Maya Bordeaux	Terry Jimenez; Timothy Knight		Email chain reflecting a request for legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
187		12/15/18	Maya Bordeaux	Justin Dearborn	Terry Jimenez; Timothy Knight		Email chain reflecting legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
188		12/15/18	Maya Bordeaux	Justin Dearborn	Terry Jimenez; Timothy Knight		Email chain reflecting legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
189		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
190		12/20/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
191		12/20/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
192		12/20/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
193		12/20/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
194		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
195		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
196		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
197		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
198		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
199		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
200		12/21/18	Mindy Lees*	David Smith			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
201		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
202		12/21/18	David Smith	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
203		12/21/18	Mindy Lees*	David Smith			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
204		12/21/18	Mindy Lees*	David Smith			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
205		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
206		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
207		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
208		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
209		12/26/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
210		12/29/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
211		12/29/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
212		12/29/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
213		12/30/18	Mindy Lees*	Maya Bordeaux; Toni Martinez			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
214		12/30/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
215		1/2/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
216		1/2/19	Bobby Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
217		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
218		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
219		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
220		1/3/19	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
221		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
222		1/3/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
223		1/3/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
224		1/3/19	Bobby Zisel	Mindy Lees*	Kevin Golen; Robert Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
225		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
226	NYDN00002117	1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
227	NYDN00002119	1/4/19	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
228		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
229		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
230		1/4/19	Bobby Zisel				Memorandum conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
231		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
232		1/4/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
233		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
234		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
235		1/4/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
236		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
237		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
238		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
239		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
240		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
241		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
242		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
243		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
244	NYDN00002196	1/4/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
245		1/4/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
246		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
247		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
248		1/6/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
249		1/7/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
250	NYDN00001923	1/7/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
251	NYDN00001924	1/7/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
252		1/7/19	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
253		1/7/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
254		1/7/19	Jean Nechvatal	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
255		1/7/19	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
256		1/7/19	Mindy Lees*	Robert Zisel	Jean Nechvatal		Email requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
257		1/7/19	Jean Nechvatal	Mindy Lees*; Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
258		1/7/19	Robert Zisel	Mindy Lees*	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
259		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
260		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
261		1/8/19	Robert Zisel	Jean Nechvatal; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
262		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
263		1/8/19	Jean Nechvatal	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
264		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
265		1/8/19	Jean Nechvatal	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
266		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
267		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
268		1/8/19	Jean Nechvatal	Mindy Lees*			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
269		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
270		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
271	NYDN00002002	1/8/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
272	NYDN00002003	1/8/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
273		1/8/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
274		1/8/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
275		1/9/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
276		1/9/19	Jean Nechvatal	Emily Ruffner			Non-responsive and not privileged parent email.	Not Privileged
277		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Work Product
278		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email.	Not Privileged
279		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
280		1/9/19	Maya Bordeaux	Jean Nechvatal; Mindy Lees*			Email requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
281		1/9/19	Maya Bordeaux				Letter sent for legal review to in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
282		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email.	Not Privileged
283		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
284		1/9/19	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Robert Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
285		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
286		1/9/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
287		1/9/19	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
288		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email.	Not Privileged

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
289		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
290		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
291		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
292		1/9/19	Jean Nechvatal	Victoria Rienks			Non-responsive and not privileged parent email.	Not Privileged
293		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
294		1/9/19	Mindy Lees*	Jean Nechvatal; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
295		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
296		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
297		1/9/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
298		1/9/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
299		1/9/19	Mindy Lees*	Maya Bordeaux	Jean Nechvatal		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
300		1/9/19	Mindy Lees*	Maya Bordeaux	Jean Nechvatal		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
301		1/9/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
302		1/9/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
303		1/9/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
304		1/9/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
305		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
306		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
307		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
308		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
309		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
310		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
311		1/10/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
312		1/10/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
313		1/10/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
314		1/10/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
315		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
316		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
317		1/10/19	Jean Nechvatal	James Brill			Non-responsive and not privileged parent email.	Not Privileged
318		1/10/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
319		1/10/19	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
320		1/10/19	Maya Bordeaux				Draft letter providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
321		1/10/19	Jean Nechvatal	Mindy Lees*, Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
322		1/10/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
323		1/10/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
324		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
325		1/11/19	Maya Bordeaux				Draft letter sent for legal review to in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
326		1/11/19	Jean Nechvatal	James Brill			Email reflecting a request for legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
327		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
328		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
329		1/11/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
330		1/11/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
331		1/11/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
332		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
333		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
334		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
335		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
336	NYDN00002108	1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
337	NYDN00002341	1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
338		1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
339		1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
340		1/14/19	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
341		1/14/19	Mindy Lees*	Robert Zisel	Kevin Golen; Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
342		1/14/19	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
343		1/14/19	Jean Nechvatal	Mindy Lees*; Deb Hindin; Lynne Allen			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
344		1/14/19	Mindy Lees*	George Martin			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
345	NYDN00002161 to NYDN00002162	1/15/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
346	NYDN00002176 to NYDN00002177	1/15/19	Mindy Lees*	Jean Nechvatal; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
347	NYDN00002159 to NYDN00002160	1/15/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain reflecting legal advice from in-house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
348		1/15/19	Jean Nechvatal	Mindy Lees*			Email requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
349		1/15/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Toni Martinez	George Martin; James Brill		Email requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
350		1/15/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; James Brill; Toni Martinez; George Martin			Email requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
351		1/15/19	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
352		1/15/19	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
353		1/15/19	Jean Nechvatal	George Martin	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
354		1/15/19	Jean Nechvatal	George Martin	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
355		1/15/19	George Martin	Jean Nechvatal			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
356		1/16/19	George Martin	Jean Nechvatal			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
357		1/16/19	Jean Nechvatal	George Martin			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
358		1/16/19	Jean Nechvatal	George Martin			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
359		1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
360		1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
361		1/16/19	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
362		1/16/19	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
363		1/16/19	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
364		1/16/19	Ed Bushey	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
365		1/16/19	Ed Bushey	Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
366		1/16/19	Mindy Lees*	Ed Bushey			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
367		1/16/19	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
368		1/16/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product
369	NYDN00001902	1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
370	NYDN00001903	1/16/19	Mindy Lees*				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
371	NYDN00001904	1/16/19	Mindy Lees*				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product
372		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
373		1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
374	NYDN00001912	1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
375	NYDN00001913	1/17/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
376	NYDN00001914	1/17/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
377		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
378		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
379		1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
380	NYDN00001907	1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; Toni Martinez; George Martin; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
381	NYDN00001909	1/17/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
382		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; Toni Martinez; George Martin; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
383		1/17/19	James Brill	Ed Bushey; Jean Nechvatal; Mindy Lees*; Toni Martinez; George Martin; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
384		1/17/19	Jean Nechvatal	James Brill; Ed Bushey; Mindy Lees*; Toni Martinez; George Martin; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
385		1/18/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez	George Martin		Email requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
386		1/18/19	Maya Bordeaux				Draft memorandum sent for legal review to in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
387		1/18/19	Mindy Lees*	Jean Nechvatal	Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
388		1/18/19	Mindy Lees*	Jean Nechvatal	Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
389		1/18/19	Ed Bushey	Terry Jimenez			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
390		1/18/19	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
391		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
392		1/18/19	George Martin	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
393		1/18/19	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
394		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
395		1/18/19	Ed Bushey	George Martin; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
396	NYDN00001910	1/18/19	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
397		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
398		1/19/19	Mindy Lees*	George Martin; James Brill			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
399		1/19/19	James Brill	George Martin			Email chain providing legal advice from in-house counsel! Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
400		1/19/19	James Brill	Mindy Lees*; George Martin			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
401		1/19/19	Mindy Lees*	James Brill	George Martin		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
402		1/19/19	Mindy Lees*	James Brill	George Martin		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
403	NYDN00002298 to NYDN00002301	1/24/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
404	NYDN00002302	1/24/19	Jean Nechvatal	Ann Barnes; Toni Martinez; Mindy Lees*			Email chain requesting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
405	NYDN00002000 to NYDN00002001	1/24/19	Barnes, Ann	Jean Nechvatal; Toni Martinez; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
406	NYDN00001998 to NYDN00001999	1/24/19	Jean Nechvatal	Ann Barnes; Toni Martinez; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
407	NYDN00001919 to NYDN00001920	1/24/19	Mindy Lees*	Ann Barnes; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
408	NYDN00001921 to NYDN00001922	1/24/19	Barnes, Ann	Mindy Lees*; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
409	NYDN00002337 to NYDN00002340	1/24/19	Mindy Lees*	Jean Nechvatal; James Brill			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
410	NYDN00001917 to NYDN00001918	1/24/19	Mindy Lees*	Ann Barnes; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
411	NYDN00002265	1/24/19	James Brill	Joshua Zuckerberg*			Email chain requesting legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
412	NYDN00002199	1/24/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
413	NYDN00002271 to NYDN00002274	1/24/19	Jean Nechvatal	Mindy Lees*; James Brill			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
414	NYDN00001895 to NYDN00001896	1/24/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
415	NYDN00002254 to NYDN00002255	1/25/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
416		1/29/19	Jean Nechvatal	Toni Martinez			Non-responsive and not privileged parent email.	Not Privileged
417		1/29/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
418		1/29/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
419	NYDN00002261 to NYDN00002264	1/29/19	James Brill	Jean Nechvatal; Mindy Lees*			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
420	NYDN00002333 to NYDN00002336	1/29/19	Mindy Lees*	James Brill; Jean Nechvatal			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
421	NYDN00002347 to NYDN00002350	1/30/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain reflecting legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
422		1/30/19	James Brill	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes	James Brill	Email requesting legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
423		1/30/19	Brill, James	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes		Email reflecting legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
424	NYDN00002227 to NYDN00002228	1/30/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
425		1/30/19	Jean Nechvatal	James Brill; Mindy Lees*; Ann Barnes			Email chain requesting legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
426		1/30/19	Jean Nechvatal	James Brill; Mindy Lees*; Ann Barnes			Email chain requesting legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
427		1/30/19	Mindy Lees*	Jean Nechvatal; James Brill; Ann Barnes			Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
428		1/30/19	Jean Nechvatal	Mindy Lees*	James Brill; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
429		1/30/19	Jean Nechvatal	Mindy Lees*	James Brill; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
430		1/30/19	James Brill	Jean Nechvatal; Mindy Lees*	Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
431		1/30/19	Jean Nechvatal	James Brill	Mindy Lees*; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
432		1/30/19	Jean Nechvatal	James Brill	Mindy Lees*; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
433		1/31/19	Mindy Lees*	James Brill; Jean Nechvatal	Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
434		1/31/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
435		1/31/19	Joshua Zuckerberg*	Jean Nechvatal	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
436		1/31/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
437		1/31/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
438		1/31/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
439		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
440		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
441		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
442		1/31/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
443		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
444		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
445		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
446		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
447		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
448		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
449		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
450		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
451		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
452		1/31/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
453		1/31/19	James Brill				Document sent for legal review to and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
454		1/31/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
455		1/31/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
456		1/31/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
457		1/31/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
458		1/31/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
459		1/31/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
460		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
461		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
462		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
463		1/31/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
464		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
465		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
466		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
467		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
468		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
469		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
470		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
471		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
472		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
473		1/31/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
474		1/31/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
475		1/31/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
476		1/31/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
477		1/31/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
478		1/31/19	Jean Nechvatal	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
479		1/31/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
480		2/1/19	Jean Nechvatal	Amy Boyles			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
481		2/8/19	James Brill	Mindy Lees*; Jean Nechvatal	Joshua Zuckerberg*		Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
482		2/8/19	Mindy Lees*	James Brill; Jean Nechvatal	Joshua Zuckerberg*		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
483		2/8/19	Joshua Zuckerberg*	James Brill	Mindy Lees*; Jean Nechvatal		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
484		2/8/19	Joshua Zuckerberg*	James Brill	Mindy Lees*; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
485		2/8/19	Mindy Lees*	Joshua Zuckerberg*; James Brill	Jean Nechvatal		Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
486		2/8/19	Jean Nechvatal	Mindy Lees*; Joshua Zuckerberg*; James Brill			Email chain providing legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
487		2/23/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
488		2/23/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
489	NYDN00002175	2/26/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding corporate compliance.	Privileged - Attorney/Client Communication
490		2/27/19	Mindy Lees*	Julie Xanders*; Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel regarding corporate compliance.	Privileged - Attorney/Client Communication
491		2/27/19	Mindy Lees*				Memorandum providing legal advice from and prepared in anticipation of litigation by in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
492	NYDN00002638	3/4/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux; Ann Barnes			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
493	NYDN00002639	3/4/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
494	NYDN00002640	3/4/19	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
495		3/4/19	Jean Nechvatal	Emily Ruffner; Toni Martinez; Yolanda Stevens; Julie Hart*			Email chain providing legal advice from in-house counsel Mindy Lees* regarding corporate compliance.	Privileged - Attorney/Client Communication
496		3/4/19	Mindy Lees*				Memorandum providing legal advice from and prepared in anticipation of litigation by in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
497		3/4/19	Jean Nechvatal	Emily Ruffner; Toni Martinez; Yolanda Stevens; Julie Hart*			Email chain providing legal advice from in-house counsel Mindy Lees* regarding corporate compliance.	Privileged - Attorney/Client Communication
498		3/4/19	Mindy Lees*				Document reflecting legal advice from and prepared in anticipation of litigation by in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
499		3/5/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez	George Martin		Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
500		3/5/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
501	NYDN00001841	3/11/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
502	NYDN00001887 to NYDN00001888	3/26/19	James Brill	Joshua Zuckerberg*			Email chain reflecting legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
503	NYDN00001889 to NYDN00001892	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
504	NYDN00001837 to NYDN00001840	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
505	NYDN00001897 to NYDN00001901	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
506	NYDN00001893 to NYDN00001894	4/4/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
507	NYDN00001885 to NYDN00001886	4/9/19	James Brill	Jean Nechvatal	Joshua Zuckerberg*		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
508	NYDN00002646 to NYDN00002647	4/9/19	James Brill	Jean Nechvatal	Joshua Zuckerberg*		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of in-house counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
509	NYDN00002488 to NYDN00002490	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
510	NYDN00002634 to NYDN00002636	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
511	NYDN00002643 to NYDN00002645	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
512	NYDN00002454 to NYDN00002456	4/9/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
513	NYDN00002430 to NYDN00002432	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
514	NYDN00002648 to NYDN00002650	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
515	NYDN00002651 to NYDN00002653	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
516		5/17/19	Jean Nechvatal	Toni Martinez			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
517		5/17/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
518		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
519		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
520		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
521		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
522		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
523		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
524		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
525		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
526		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
527		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
528		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
529		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
530		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
531		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
532		5/29/19	Joshua Zuckerberg*	James Brill; Jean Nechvatal	Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
533		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
534		5/29/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
535		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
536		5/29/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
537		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	Toni Martinez; James Brill		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
538		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
539		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
540		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	Toni Martinez; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
541		5/29/19	Jean Nechvatal	Robert Zisel	Joshua Zuckerberg*		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
542		5/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigatoins at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
543		5/29/19	Jean Nechvatal	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
544		5/29/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
545		5/30/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
546		5/30/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
547		5/30/19	Jean Nechvatal	Toni Martinez; Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
548		5/30/19	Yasmin Firouzi				Document reflecting legal advice from outside counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
549		5/30/19	Yasmin Firouzi				Document reflecting legal advice from outside counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
550		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
551		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
552		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
553		5/30/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from outside counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
554		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
555		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
556		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
557		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
558		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
559		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
560		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
561		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
562		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
563		5/30/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
564		5/30/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
565		5/30/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
566		5/30/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
567		5/30/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
568		5/30/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
569		5/30/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
570		5/30/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
571		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
572		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
573		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
574		5/30/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
575		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
576		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
577		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
578		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
579		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
580		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
581		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
582		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
583		5/30/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
584		5/30/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
585		5/30/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
586		5/30/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
587		5/30/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
588		5/30/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
589		5/30/19	Robert Zisel	Jean Nechvatal	Joshua Zuckerberg*		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
590		5/30/19	Robert Zisel				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
591		5/30/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
592		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
593		5/31/19	Joshua Zuckerberg*	Jean Nechvatal; Toni Martinez	James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
594		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez	James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
595		5/31/19	Joshua Zuckerberg*	Robert Zisel; Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
596		5/31/19	Robert Zisel	Joshua Zuckerberg*; Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
597		5/31/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
598		6/3/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
599		6/3/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
600		6/3/19	Jean Nechvatal	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
601		6/3/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
602		6/3/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
603		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
604		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
605		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
606		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
607		6/5/19	Joshua Zuckerberg*	James Brill; Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
608		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
609		6/5/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
610		6/5/19	James Brill	Jean Nechvatal; Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
611		6/5/19	Jean Nechvatal	Joshua Zuckerberg*; James Brill			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
612		6/5/19	Jean Nechvatal	Toni Martinez			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
613		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
614		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
615		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
616		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
617		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
618		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
619		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
620		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
621		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
622		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
623		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
624		6/6/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
625		6/6/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez; James Brill			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
626		6/6/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP
627		6/6/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
628		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
629		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
630		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
631		6/6/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
632		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
633		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
634		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
635		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
636		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
637		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
638		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
639		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
640		6/6/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
641		6/6/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
642		6/6/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
643		6/6/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
644		6/6/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
645		6/6/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
646		6/6/19	Jean Nechvatal	Robert Zisel; Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
647		6/10/19	Jean Nechvatal	Joshua Zuckerberg*; James Brill; Toni Martinez			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
648		6/10/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
649		6/10/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
650		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
651		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
652		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
653		6/10/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
654		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
655		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
656		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
657		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
658		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
659		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
660		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
661		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
662		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
663		6/10/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
664		6/10/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
665		6/10/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
666		6/10/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly litigation.	Privileged - Work Product
667		6/10/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
668		6/10/19	Jean Nechvatal	Joshua Zuckerberg*; James Brill; Toni Martinez			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
669		6/10/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
670		6/10/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
671		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
672		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
673		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
674		6/10/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
675		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
676		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
677		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
678		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
679		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
680		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
681		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
682		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
683		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
684		6/10/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
685		6/10/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
686		6/10/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
687		6/10/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
688		6/10/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
689		6/10/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
690		6/13/19	Joshua Zuckerberg*	Jean Nechvatal; James Brill; Toni Martinez			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
691		6/13/19	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
692		6/13/19	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
693		6/13/19	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
694		6/13/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
695		6/13/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal; James Brill		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
696		6/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez	Jean Nechvatal		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
697		6/13/19	James Brill	Joshua Zuckerberg*			Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
698		6/13/19	Michelle Sweeney				Memorandum conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
699		7/9/19	James Brill	Joshua Zuckerberg*; Julie Xanders*			Email chain requesting legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
700		7/29/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
701		7/29/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
702		7/29/19	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
703		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
704		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
705		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
706		7/29/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
707		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
708		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
709		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
710		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
711		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
712		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
713		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
714		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
715		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
716		7/29/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
717		7/29/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
718		7/29/19	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
719		7/29/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
720		7/29/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
721		7/29/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
722		7/30/19	Joshua Zuckerberg*	James Brill; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
723		7/30/19	Ed Bushey	Joshua Zuckerberg*	James Brill; Julie Xanders*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
724		7/30/19	James Brill	Ed Bushey; Joshua Zuckerberg*	Julie Xanders*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
725		7/30/19	Julie Xanders*	James Brill; Ed Bushey; Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
726		7/30/19	Joshua Zuckerberg*	Julie Xanders*	James Brill; Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
727		7/30/19	James Brill	Joshua Zuckerberg*; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
728		7/30/19	James Brill	Joshua Zuckerberg*; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
729		7/30/19	Julie Xanders*	James Brill	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
730		7/30/19	James Brill	Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
731		7/30/19	James Brill	Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
732		7/30/19	Ed Bushey	James Brill			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
733		7/30/19	Ed Bushey	James Brill			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
734		7/30/19	James Brill	Ed Bushey			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
735		7/30/19	James Brill	Ed Bushey			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
736		7/31/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
737		8/7/19	Marie Green	Toni Martinez; Jean Nechvatal			Email chain requesting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
738		8/7/19	Marie Green				Draft letter sent for legal review to outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
739		8/7/19	Marie Green				Draft letter sent for legal review to outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
740		8/8/19	Toni Martinez	James Brill; Joshua Zuckerberg*			Email chain requesting legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
741		8/8/19	Marie Green				Draft agreement reflecting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
742		8/8/19	Toni Martinez	Joshua Zuckerberg*; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
743		8/8/19	Marie Green				Draft agreement sent for legal review to outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
744		8/8/19	Joshua Zuckerberg*	James Brill	Toni Martinez		Email providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
745		8/8/19	Joshua Zuckerberg*				Draft agreement providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
746		8/8/19	Joshua Zuckerberg*				Draft agreement providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
747		8/13/19	Toni Martinez	Joshua Zuckerberg*; James Brill			Email chain requesting legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
748		8/13/19	Joshua Zuckerberg*	Toni Martinez	James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
749		8/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
750		8/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
751	NYDN00002497 to NYDN00002499	8/21/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
752	NYDN00002457 to NYDN00002460	8/26/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
753	NYDN00002424 to NYDN00002427	8/26/19	James Brill	Joshua Zuckerberg*	Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
754	NYDN00002605 to NYDN00002608	8/26/19	Toni Martinez	James Brill; Joshua Zuckerberg*			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
755	NYDN00002419 to NYDN00002423	8/26/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
756	NYDN00002351 to NYDN00002355	8/26/19	Toni Martinez	Joshua Zuckerberg*; James Brill			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
757		8/27/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
758		8/27/19	Joshua Zuckerberg*				Draft agreement providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
759		8/29/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
760		8/29/19	Joshua Zuckerberg*				Draft agreement reflecting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
761	NYDN00002386 to NYDN00002387	9/4/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
762	NYDN00002573 to NYDN00002573	9/9/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
763		9/9/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
764		9/9/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
765		9/9/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
766		9/9/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
767		9/9/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
768		9/10/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
769		9/10/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
770		9/10/19	James Brill	Toni Martinez	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
771		9/10/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
772		9/10/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
773		9/10/19	James Brill	Toni Martinez	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
774	NYDN00002222 to NYDN00002225	9/17/19	James Brill	Toni Martinez; Marie Green			Email chain requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
775	NYDN00002492 to NYDN00002495	9/17/19	James Brill	Toni Martinez; Marie Green			Email chain requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
776	NYDN00002630 to NYDN00002633	9/17/19	Toni Martinez	James Brill; Marie Green			Email requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
777	NYDN00002250 to NYDN00002253	9/17/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D'Ambly settlement.	Privileged - ACC/WP
778	NYDN00002256 to NYDN00002260	9/17/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
779	NYDN00002357 to NYDN00002369	9/18/19	Joshua Zuckerberg*	Marie Green	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
780	NYDN00002373 to NYDN00002385	9/18/19	Marie Green	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
781	NYDN00002398 to NYDN00002418	9/18/19	Joshua Zuckerberg*	Marie Green	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
782	NYDN00002433 to NYDN00002453	9/18/19	Marie Green	Toni Martinez			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
783	NYDN00002609 to NYDN00002629	9/18/19	Toni Martinez	Joshua Zuckerberg*; Marie Green	James Brill		Email chain requesting legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
784	NYDN00002516 to NYDN00002551	9/18/19	Joshua Zuckerberg*	Toni Martinez	Marie Green; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
785	NYDN00002229 to NYDN00002249	9/18/19	James Brill	Joshua Zuckerberg*; Marie Green	Toni Martinez		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
786	NYDN00002467 to NYDN00002487	9/18/19	James Brill	Joshua Zuckerberg*; Marie Green	Toni Martinez		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
787	NYDN00002584 to NYDN00002604	9/18/19	Toni Martinez	James Brill; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
788	NYDN00002201 to NYDN00002221	9/18/19	James Brill	Toni Martinez; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
789	NYDN00002552 to NYDN00002572	9/18/19	James Brill	Toni Martinez; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D'Ambly settlement.	Privileged - ACC/WP
790		10/30/20	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
791		10/30/20	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
792		10/30/20	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
793		10/30/20	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
794		10/30/20	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
795		10/30/20	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
796		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
797		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
798		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
799		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
800		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
801		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
802		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
803		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
804		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
805		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
806		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
807		10/30/20	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
808		10/30/20	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
809		2/9/21	Toni Martinez	Joseph Mulherin*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
810		2/9/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
811		2/9/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
812		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
813		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
814		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
815		2/9/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
816		2/9/21	Toni Martinez				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
817		2/9/21	Toni Martinez				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
818		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
819		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
820		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
821		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
822		2/9/21	Toni Martinez				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
823		2/9/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
824		2/9/21	Toni Martinez				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
825		2/9/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
826		2/9/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
827		2/9/21	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
828		2/9/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
829		2/9/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
830	NYDN00002099 to NYDN00002106	3/8/21	Toni Martinez	Joshua Zuckerberg*; Joseph Mulherin*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
831		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
832		3/31/21	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
833		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
834		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
835		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
836		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
837		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
838		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
839		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
840		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
841		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
842		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
843		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
844		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
845		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
846		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
847		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
848		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
849		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
850		3/31/21	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
851		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
852		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
853		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
854		3/31/21	Jean Nechvatal	Joshua Zuckerberg*	Barnes, Ann; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
855		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
856		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
857		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
858		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
859		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
860		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
861		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
862		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
863		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
864		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
865		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
866		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
867		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
868		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
869		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
870		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
871		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
872		3/31/21	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
873		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
874		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
875		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
876		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
877		3/31/21	James Brill	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes		Email reflecting legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
878		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
879		3/31/21	Jean Nechvatal				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
880		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
881		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
882		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
883		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
884		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
885		3/31/21	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
886		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
887		3/31/21	Ann Barnes				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
888	NYDN00002077	3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
889		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
890		3/31/21	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
891		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
892		3/31/21	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
893		3/31/21	Maya Bordeaux				Draft letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
894		3/31/21	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
895		3/31/21	Martin, George	Jean Nechvatal			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
896		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
897		3/31/21	Martin, George	Jean Nechvatal	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
898		3/31/21	Mindy Lees*				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
899		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
900		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
901		3/31/21	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
902		3/31/21	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
903		3/31/21	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
904		3/31/21	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
905		3/31/21	George Martin	Jean Nechvatal			Email chain requesting legal advice from in-house counsel Mindy Lees* regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
906		3/31/21	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
907		3/31/21	Jean Nechvatal	Toni Martinez	Joseph Mulherin*		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
908		3/31/21	Martin, George	Jean Nechvatal	Ed Bushey		Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
909		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
910		3/31/21	Martin, George	Ed Bushey			Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
911		3/31/21	Jean Nechvatal				Document conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
912		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
913		3/31/21	Jean Nechvatal				Document conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
914		3/31/21	Martinez, Toni	Jean Nechvatal; Ed Bushey			Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
915		3/31/21	James Brill				Document conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
916		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP
917		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
918		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
919		3/31/21	Jean Nechvatal				Document conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
920		3/31/21	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
921		3/31/21	Maya Bordeaux				Draft letter providing legal advice from Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
922		3/31/21	Barnes, Ann	Jean Nechvatal	James Brill; Mindy Lees*; Toni Martinez		Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
923		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
924		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
925		3/31/21	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
926		3/31/21	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
927	NYDN00002082	3/31/21	Ann Barnes	Jean Nechvatal	James Brill; Mindy Lees*; Toni Martinez		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
928		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
929		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Robert Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
930		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
931		3/31/21	Maya Bordeaux	Jean Nechvatal; Mindy Lees*			Email requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
932		3/31/21	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
933		3/31/21	Jean Nechvatal	Jean Nechvatal			Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
934		3/31/21	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
935		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
936		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
937		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
938		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
939		3/31/21	Robert Zisel	Mindy Lees*	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
940		3/31/21	Jean Nechvatal				Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
941		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Bobby Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
942		3/31/21	Maya Bordeaux	Jean Nechvatal; Mindy Lees*			Email requesting legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
943		3/31/21	Maya Bordeaux				Draft letter reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
944		3/31/21	Robert Zisel	Mindy Lees*; Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
945		3/31/21	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
946		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
947		3/31/21	Robert Zisel	Mindy Lees*	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
948		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
949		3/31/21	Mindy Lees*	Robert Zisel	Jean Nechvatal		Email requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
950		3/31/21	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
951		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
952		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
953		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
954		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
955		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
956		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
957		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
958		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
959		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
960		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
961		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
962		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
963		3/31/21	Mindy Lees*	Robert Zisel	Jean Nechvatal		Email requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
964		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication



Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
965		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
966		3/31/21	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
967		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
968	NYDN00002085	3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
969		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
970		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
971		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
972		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
973		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
974		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
975		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
976		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
977		3/31/21	Marie Green	Toni Martinez; Jean Nechvatal			Email chain requesting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
978		3/31/21	Marie Green				Draft agreement sent for legal review to outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
979		3/31/21	Jean Nechvatal				Draft agreement sent for legal review to outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
980		3/31/21	Brill, James	Joshua Zuckerberg*; Jean Nechvatal	Ed Bushey		Email chain conveying information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
981		3/31/21	Joshua Zuckerberg*	Bobby Zisel' [Robert Zisel]	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
982		3/31/21	Joshua Zuckerberg*				Document for sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
983		3/31/21	Brill, James	Jean Nechvatal; Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
984		3/31/21	Bobby Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
985		3/31/21	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
986		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
987		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
988		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
989		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
990		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
991		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from outside counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
992		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
993		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
994		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
995		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
996		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
997		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
998		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
999		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1000		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1001		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1002		3/31/21	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1003		3/31/21	Maya Bordeaux				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
1004		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1005		3/31/21	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1006		3/31/21	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1007		3/31/21	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
1008		3/31/21	James Brill	Jean Nechvatal; Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1009		3/31/21	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - Attorney/Client Communication
1010		3/31/21	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1011		3/31/21	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1012		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1013		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1014		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1015		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1016		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1017		3/31/21	Bobby Zisel				Memorandum conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1018		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1019		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1020		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1021		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1022		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1023		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1024		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1025		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1026		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1027		3/31/21	James Brill				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1028		3/31/21	James Brill				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1029		3/31/21	Maya Bordeaux				Memorandum reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1030		3/31/21	Ann Barnes				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1031		3/31/21	Ann Barnes				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1032		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1033		3/31/21	Jean Nechvatal				Document conveying information to facilitate the rendering of legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1034		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain reflecting legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
1035		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1036		3/31/21	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1037		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1038		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1039		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1040		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1041		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1042		3/31/21	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1043		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1044		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1045		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1046		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1047		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1048		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1049		3/31/21	Martinez, Toni	Jean Nechvatal; Mindy Lees*; Maya Bordeaux			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1050		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1051		3/31/21	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1052		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1053		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1054		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1055		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
1056	NYDN00002088	3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	To	CC	BCC	Log Description	Privilege Type
1057	NYDN00002089	3/31/21	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1058		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1059		3/31/21	Toni Martinez	Jean Nechvatal; Mindy Lees*; Maya Bordeaux			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1060		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in-house counsel Mindy Lees* regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication



<b><u>Name</u></b>	<b><u>Affiliation</u></b>
Lynne Allen	Chicago Tribune
Ann Barnes	Tribune Publishing Co.
Maya Bordeaux	Tribune Publishing Co.
Amy Boyles	Tribune Publishing Co.
James Brill	New York Daily News
Ed Bushy	Tribune Publishing Co.
Justin Dearborn	Tribune Publishing Co.
Yasmin Firouzi	Los Angeles Times
Max Fischer*	Sidley Austin LLP
Kevin Golen	Insite Risk Management
Marie Green	New York Daily News
Julie Hart*	Tribune Publishing Co.
Deb Hindin	Chicago Tribune
Eric Hoffman*	Sidley Austin LLP
Terry Jimenez	Tribune Publishing Co.
Lane Kehler	Insite Risk Management
Bruce Kerr	New York Daily News
Timothy Knight	Tribune Publishing Co.
Marisa Kollias	Tribune Publishing Co.
Mindy Lees*	Tribune Publishing Co.
Matthew Leish	New York Daily News
George Martin	New York Daily News
Toni Martinez	Tribune Publishing Co.
Joseph Mulherin*	McDermott Will & Emery LLP
Jean Nechvatal	Tribune Publishing Co.
Ginger Otis	New York Daily News
Victoria Rienks	Tribune Publishing Co.
Emily Ruffner	Chicago Tribune
David Smith	Tribune Publishing Co.
Yolanda Stevens	Orlando Sentinel
Michelle Sweeney	New York Daily News
Marci Sweren*	New York Daily News
Sarp Uzkan	Tribune Publishing Co.
Grant Whitmore	Tribune Publishing Co.
Julie Xanders*	Tribune Publishing Co.
Robert York	New York Daily News
Robert Zisel	Insite Risk Management
Joshua Zuckerberg*	Pryor Cashman LLP